

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 10/14/14

COMMONWEALTH LAND TRUST

(In the space above enter the full name(s) of the plaintiff(s)/petitioner(s).)

- against -

13 Civ. 7626 (RB)

ANM FUNDING LLC. ABE KLEIN NOCH ANSWER

(In the space above enter the full name(s) of the defendant(s)/respondent(s).)

I

ADMISSIONS AND DENIALS

In this section, state which factual allegations in the complaint you admit to and which factual allegations you deny. You should refer to the complaint paragraph by paragraph (and sentence by sentence within each paragraph), in the same order as the paragraphs and sentences appear in the complaint. Attach additional sheets of papers as necessary.

1. RUNG SEAL
2. I WAS NOT A PRINCIPAL OF ANM FUNDING LLC.
3. _____
4. _____
5. _____
6. _____
7. _____
8. _____
9. _____
10. _____

II**DEFENSES**

In this section, state any legal theories that, even assuming that what plaintiff has alleged in the complaint is true, do not permit the plaintiff to win the case. Attach additional sheets of paper as necessary.

FIRST DEFENSE:

SECOND DEFENSE:

THIRD DEFENSE:

WHEREFORE defendant asks this Court to dismiss the complaint and enter judgment in favor of defendant.

[If you have any counterclaim against the plaintiff that arises out of the same events or transactions stated in the complaint, and/or any crossclaims against the other defendants that arise out of the same events or transactions stated in this complaint, and/or any third-party claims you have against third-parties (that is, someone not already named in the lawsuit) that arise out of the same events or transactions stated in the complaint, you should attach additional sheets of paper to set forth the facts and bases for any such claims. See the Pro Se Manual for a further explanation.]

I declare under penalty of perjury that the foregoing is true and correct.

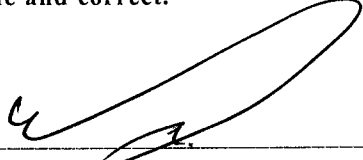
Signed this 10 day of 14, 2014

Signature of Defendant

Address

Telephone Number

Fax Number (if you have one)


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BROOKLYN NY 11204
718 437 4462